

Exhibit B - I

Exhibit B-1

Previous Answer to Motion to Dismiss

Appellant Asserts that Lack of Staff or Funds is no excuse for Refusing Medical Treatment. See Jones v Johnson 781 F2d 769 771 ; Harris v Thigpen 941 F2d 1495, 1509.

Plaintiff Asserts that Defendants Stanley Taylor and Chris Malaney and peripheral staff have Allowed and have caused to be in operation a Medical System that is unprepared, to the point of negligence, to serve the needs of the inmate population, and this has Filtered down to Appellant and caused 8th Amendment Violations by denying Appellant proper Medical treatment, proper Dental treatment, and more than see se mental health treatment. Furthermore Appellant, for the same aforementioned reason had been subject to unnecessary abuses and psychic distress - which may carry into the future - for Stanley Taylor and Chris Malaney being negligent in permitting to operate an understaffed, underequipped and underfunded Medical Dept.

Plaintiff asks to be allowed to obtain records for future litigation.

Exhibit B-2 ~~8~~

Exhibit B-2

Previous answer to motion to Dismiss

U.S.C.A. Const. Amend. 8

Appellant Requests that this case be considered against Stanley Taylor and Chris Milaney in their individual capacity, as well as their Administrative Capacity. Citing the Complaint may be amended at any time to conform to the evidence, see Regents of the University of Mich. v Ewing 474 US 215, 106 S.Ct. 509, 511

Defendants did not mention in their arguments Appellants Complaint about Dental Work and against Dental Nurse or Supervisor (Georgiana Meekens. (Proberly known as Georgianna Meekens)

Appellant has requested Dental Work - Appellant has no teeth - Since 16 September 05 See App 8. Appellant has grieved this issue, with no results, see exhibit A pg 12, 13. Appellant has Stomach problems because he cannot Chew his Food correctly. Georgiana Meekens, knowing this has Refused Appellant Dental Treatment, Stating that Correctional Medical Systems "did not have the personnel or the Funds" to provide Appellant with Dental Work At this time; that Appellant may have to "wait a year or so."

*March 05